UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS VICTORIA DIVISION

STATE OF TEXAS, STATE OF LOUISIANA)))
Plaintiffs, v.))) No. 6:21-cv-00016
UNITED STATES OF AMERICA, et al.)
Defendants.)))

PLAINTIFFS' WITNESS LIST

Consistent with the Court's December 23, 2021 Order, ECF No. 140, and the agreement of the parties, Plaintiffs' declarations designated as exhibits may be considered by the Court at trial without the need for live testimony from the declarants. Plaintiffs also plan to call two of the declarants as witnesses.

Plaintiffs designate the following witnesses to testify at trial:

1. Thomas Homan, former Acting Director of U.S. Immigration and Customs Enforcement (ICE)

Mr. Homan will testify on the topics raised in his Trial Declaration, including the effects of the guidance challenged in this case on the enforcement efforts of ICE officers, and the capability of Defendants to increase their detention capacity.

2. Jason Clark, Chief of Staff of the Texas Department of Criminal Justice

Mr. Clark will testify on the topics raised in his Trial Declaration, including the effects of the guidance challenged in this case on detainers for inmates within the Texas Department of Criminal Justice.

Date: January 11, 2022

KEN PAXTON

Attorney General of Texas

Brent Webster

First Assistant Attorney General

JUDD E. STONE II Solicitor General Respectfully submitted.

PATRICK K. SWEETEN

Deputy Attorney General for Special Litigation

Attorney-in-Charge

Texas Bar No. 00798537

Southern District of Texas Bar No. 1829509

patrick.sweeten@oag.texas.gov

WILLIAM T. THOMPSON

Deputy Chief, Special Litigation Unit

Texas Bar No. 24088531

Southern District of Texas Bar No. 3053077

will.thompson@oag.texas.gov

/s/ Ryan D. Walters

RYAN D. WALTERS

Special Counsel

Texas Bar No. 24105085

Southern District of Texas Bar No. 3369185

ryan.walters@oag.texas.gov

OFFICE OF THE ATTORNEY GENERAL

P.O. Box 12548 (MC-009)

Austin, Texas 78711-2548

Tel.: (512) 463-2100

Fax: (512) 457-4410

COUNSEL FOR PLAINTIFF STATE OF TEXAS

JEFF LANDRY

LOUISIANA ATTORNEY GENERAL

/s/ Elizabeth B. Murrill

ELIZABETH B. MURRILL

Solicitor General

JOSEPH S. ST. JOHN

Deputy Solicitor General

Louisiana Department of Justice

1885 N. Third St.

Baton Rouge, LA 70804

(225) 326-6766

murrille@ag.louisiana.gov

stjohnj@ag.louisiana.gov

COUNSEL FOR PLAINTIFF STATE OF LOUISIANA

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on January 11, 2022, which automatically serves all counsel of record who are registered to receive notices in this case.

/s/ Ryan D. Walters
RYAN D. WALTERS